

**UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS**

UNITED STATES OF AMERICA

v.

PETER MAGGIO, et al,

CR. NO. 04-10231-MLW

**DEFENDANT LOUIS A. PARADISO'S
MOTION TO EXTEND TIME TO FILE
SUPPLEMENTAL SENTENCING MEMORANDUM**

Defendant, Louis Paradiso, hereby moves, by and through undersigned counsel, for an extension of time from Monday, November 13, 2006 until Friday, November 17, 2006 to file his Supplemental Sentencing Memorandum. See Supplemental Memorandum filed simultaneously herewith.

In support of this motion, undersigned counsel states that, as a result of traveling to Los Angeles, California on an unrelated personal matter the weekend of November 12, 2006, and the inability to schedule a return flight until the morning of November 13, 2006, undersigned counsel was not able to file a Supplemental Sentencing Memorandum within the time previously allowed by the Court. In addition, other professional and personal commitments have prevented undersigned counsel from drafting the Supplemental Sentencing Memorandum until today. A copy of Paradiso's Supplemental Sentencing Memorandum has been sent to the government by facsimile today. Also, Paradiso should not be penalized because undersigned counsel's professional and personal commitments prevented him from filing his Supplemental Memorandum in a timely manner.

WHEREFORE, defendant Paradiso respectfully requests that the Court grants this motion and permit him to file his Supplemental Memorandum today, November 17, 2006.

Respectfully submitted
By Defendant,
LOUIS A. PARADISO
By his attorney,

/s/ Scott P. Lopez
Scott P. Lopez
Law Office of Scott P. Lopez
24 School Street, 8th Floor
Boston, MA 02108
(617) 742-5700

Dated: November 17, 2006

LOCAL RULE 7.1 CERTIFICATION

I hereby certify that I have conferred with counsel for the government, Assistant U.S. Attorney Victor Wild, in a good faith attempt to resolve or narrow this issue in this motion.

/s/ Scott P. Lopez
Scott P. Lopez

CERTIFICATE OF SERVICE

I hereby certify that this document filed through the ECF system will be sent electronically to the registered participants as identified on the Notice of Electronic Filing (NEF) and paper copies will be sent to those indicated as non-registered participants on November 17, 2006.

/s/ Scott P. Lopez
Scott P. Lopez